

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PAUL VANDERHEIDEN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., ROBERT J.
PERA, KEVIN RADIGAN, CRAIG L. FOSTER
and MARK SPRAGG,

Defendants.

No.: 1:18-cv-01620

**NOTICE OF MOTION OF XIYA
QIAN FOR CONSOLIDATION,
APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF
COUNSEL**

XIYA QIAN, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., ROBERT J.
PERA, KEVIN RADIGAN, CRAIG L. FOSTER
AND MARK SPRAGG,

Defendants.

No.: 1:18-cv-01841

JOHN KHO, Individually and on Behalf Of All
Others Similarly Situated,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., ROBERT J.
PERA AND KEVIN RADIGAN,

Defendants.

No.: 1:18-cv-02242

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Xiya Qian (“Qian”) by and through her counsel, will and does hereby move this Court, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995, for the entry of an Order: (1) consolidating the above-captioned related actions; (2)

appointing her as Lead Plaintiff on behalf of all persons and entities that purchased or otherwise acquired the securities of Ubiquiti Networks, Inc. between May 9, 2013 and February 20, 2018, both dates inclusive; (3) approving Lead Plaintiff's selection of Pomerantz LLP as Lead Counsel for the Class; and (4) granting such other and further relief as the Court may deem just and proper.

Dated: April 23, 2018

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

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*Counsel for Movant and
Proposed Lead Counsel for the Class*

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